

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re: §
§ KrisJenn Ranch, LLC, § Chapter 11
§
§
Debtor § Case No. 20-50805

UNOPPOSED MOTION TO CONTINUE HEARING SET FOR NOVEMBER 23, 2020

TO THE HONORABLE RONALD B. KING, CHIEF UNITED STATES BANKRUPTCY JUDGE:

COME NOW DMA Properties, Inc. and Frank Daniel Moore (together, “Movants”) and file their *Unopposed Motion to Continue Hearing Set For November 23, 2020*. In support thereof, the Movants respectfully show as follows:

1. On October 26, 2020, Debtors filed their Motion For Partial Summary Judgment on Frank Daniel Moore's Claims [Dkt. 117] and Motion For Partial Summary Judgment on DMA's Claims [Dkt. 118] (together, the “Debtors’ Summary Judgment Motions”).

2. Currently, the Debtors’ Summary Judgment Motions are set for hearing on November 23, 2020.

3. Movants respectfully request that the hearing be re-scheduled for December 7, 2020 and that the deadline for Movants to file their Responses to the Debtors’ Summary Judgment Motions be set for November 30, 2020.

4. This continuance is not sought for the purpose of delay and will not cause a delay in the trial on the merits of this matter, which is set to commence on January 11, 2021.

5. Tim Cleveland, counsel for Movants, has conferred with Debtors’ counsel regarding the relief sought herein. Debtors’ counsel is not opposed.

WHEREFORE, PREMISES CONSIDERED, Movants pray that the Court enter an order continuing the hearing on Debtors’ Summary Judgment Motions to December 7, 2020, setting the deadline for Movants to file their responses thereto by November 30, 2020, and for such other relief to which they may be entitled at law or equity.

Dated November 12, 2020.

Respectfully submitted,

/s/ Christopher S. Johns

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Attorneys for Frank Daniel Moore and DMA Properties, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2020, a true and correct copy of the above and foregoing instrument was served via the Court's electronic transmission facilities on those parties registered for such notice and served via first class mail, postage prepaid on the parties below.

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<p>William P. Germany Email: wgermany@bsklaw.com BAYNE, SNELL & KRAUSE 1250 N.E. Loop 410, Suite 725 San Antonio, Texas 78209</p> <p>COUNSEL FOR Third Party Defendant Larry Wright</p>	<p>John Terrill 12712 Arrowhead Lane Oklahoma City, OK 73120</p> <p>Third Party Defendant, <i>pro se</i></p>

/s/ Natalie F. Wilson
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